

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

NBCUNIVERSAL MEDIA, LLC, Apple Inc., John Does 1-50

Defendants.

Case No. **25-CV-05690**

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION TO SEAL
CONFIDENTIAL EXHIBITS**

Plaintiff Jane Doe submits this memorandum of law in support of her motion to seal Confidential Exhibits A through K, pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure, Local Rule 79.3, and controlling case law.

I. LEGAL STANDARD

Courts in this District follow the three-part framework in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), to evaluate sealing motions:

1. Whether the document is a judicial record;
2. The weight of the presumption of public access;
3. Whether countervailing factors justify sealing.

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Courts routinely grant sealing when documents involve privacy rights, medical and mental health information, and sensitive forensic data. See *Doe v. Fedcap Rehabilitative Servs., Inc.*, No. 17-CV-8220 (JPO), 2018 WL 2021588 (S.D.N.Y. Apr. 27, 2018); *United States v. Amodeo*, 44 F.3d 141 (2d Cir. 1995).

II. GOOD CAUSE EXISTS TO SEAL

The Confidential Exhibits include:

- Appendix D: Medical and psychiatric documentation, warranting protection under the ADA and HIPAA;
- Appendix G: Digital logs and system access reports containing network signatures, forensic screenshots, and third-party certificate identities;
- Appendix I: FOIA requests and government agency correspondence relevant to ongoing legal investigations;
- Appendices A, F, J, and K: Personally identifiable information, minor child references, and vehicle-level surveillance patterns with public safety implications.

Unsealing these exhibits could compromise Plaintiff's physical security and subject her to further retaliation or digital targeting. Plaintiff is proceeding under pseudonym, and sealing is a necessary adjunct to maintain the integrity of that protection.

III. CONCLUSION

Plaintiff respectfully requests that this Court grant her motion to seal Exhibits A through K in their entirety.

Dated: [Insert Date] 7/11/25

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jane Doe". The signature is fluid and cursive, with the first name "Jane" and last name "Doe" clearly distinguishable.

Jane Doe

Plaintiff, pro se